

# **EXHIBIT B**



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ADMITTED: NEW YORK, EIGHTH CIRCUIT  
SECOND CIRCUIT, ALGERIAN BAR  
US COURT ON INTERNATIONAL TRADE

July 12, 2019

**VIA EMAIL**

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**In re: Terrorist Attacks on September 11, 2001 03 MDL 1570**

Dear Robert, Sean, and Andrew:

We write in response to your letter of July 11, 2019.

First, regarding 107 of the Deposition Protocol Order, while we agree that it does not "require" advance production of foreign language documents, it does specifically provide that "Counsel will meet and confer to discuss any further protocols regarding the sharing of foreign language documents and translations in advance of the deposition." From your letter of July 11, 2019, we conclude that you are not willing to discuss sharing foreign language documents and translations in advance of the upcoming depositions. Please be advised that WAMY's inability to review your translation of any foreign language document in advance of the deposition will result in WAMY witnesses taking necessary time to review and compare between the Arabic and translated documents through counsel during the depositions. Objections will also be asserted when applicable. For the sake of efficiency and economy of time, we again urge you to reconsider your position as to advance production and are willing to discuss this with you if you chose to do so.

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Second, as we advised you in our June 26, 2019 letter, given the difficulties in arranging witness travel schedules, Dr. Noorwali will only be available to testify both as a fact witness and 30(b)(6) witness in July. Please provide the amount allotted to Dr. Noorwali to testify in his capacity as a 30(b)(6) witness during the July depositions. Please get back to us no later than Monday, July 15, 2019.

With respect to the October 2019 depositions, as discussed, the dates for the 30(b)(6) witnesses -- October 21 to 22 -- are set and immovable. We shall produce Dr. Abdullah, Dr. Al Mazroo, and Dr. Al Wohaibi as our 30(b)(6) witnesses in that order over the course of whatever time remains of your 10.5 hours after your 30(b)(6) deposition of Dr. Noorwali. The factual testimony of Dr. Al Wohaibi is set for October 23-24.

Finally, Ms. Dika's resume was not attached to your letter. Could you please send that at your earliest convenience? We look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to be 'Omar Mohammedi', with a stylized, cursive script.

Omar Mohammedi

/s/ Fredrick Goetz

Frederick J. Goetz, Esq.